

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

HEIDI K. ERICKSON  
Plaintiff

FILED  
U.S. DISTRICT COURT  
DISTRICT OF MASSACHUSETTS  
CIVIL ACTION NO. 04-11607  
2004 JUL 19 P 4:32

v.

EMERGENCY MOTION FOR  
PRELIMINARY INJUNCTION

COMMONWEALTH OF MASSACHUSETTS  
Mitt Romney, Governor, et al

The Plaintiff, Ms. Heidi K. Erickson, ask this Honorable Court to issue the following preliminary injunctions a. – d. and those wherefore requests herein until such time as the merits of this case are decided by this court.

- a. Order restraining the Defendants (Massachusetts Department of Agricultural Resources MDA) from requiring Ms. Erickson's Persians to be held under unnecessary conditions and/or a facility other then her home and/or other requirements more stringent then those recommended by the CDC and or the US Department of Agriculture.
- b. Order restraining the Defendants (Massachusetts Department of Agricultural Resources MDA) from releasing immediately and/or rescinding the issued quarantine and release any constraints it placing upon the immediate return of Ms. Erickson's Persians.
- c. Order compelling the Defendants (Massachusetts Department of Agricultural Resources MDA) to immediately transport Ms. Erickson's Persians to her home without delay and or restrictions that require her to operate her home under the applicable laws for pet shops.
- d. Order restraining and prohibiting the Defendants from slander, and disseminating private information from Erickson's file and/or on Erickson's Persians to any third party.
- e. Order restraining the Defendants (Animal Rescue League, ARL) from depriving Ms. Erickson access and/or impede the releasing immediately of Ms. Erickson's Persians.

IN SUPPORT

Plaintiff relies upon her filed herewith Complaint, Memorandum of Law in Support of Preliminary Injunction.

Plaintiff is the owner of said Persians who have been unlawfully held by the Defendants and have deprived these gentle creatures adequate veterinary care to their harm.

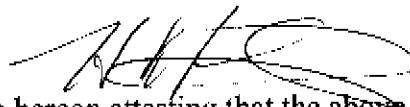
Plaintiff states that she has a strong likelihood of success on the merits of the claims in her Complaint and has not been fully heard on these issues, and will suffer irreparable harm if this

court fails to grant this request for preliminary relief. The Defendants will not suffer any harm from the issuance of these orders and the public interest will be well served by the correct implementation of Constitutional protections, and for reasonable prudent due process.

Plaintiff's claims are supported by the arguments in Plaintiff's Amended Memorandum of Law in Support of Preliminary Injunction (soon to be filed) and the facts in the Plaintiff's Verified Complaint filed herewith of which a court of competent and unbiased jurisdiction has not fully heard.

WHEREFORE, all relief requested previous pleadings and all other relief that this Honorable Court deems just and fair.

Respectfully submitted by:



I sign hereon attesting that the above paragraphs and the attached Memorandums are true under the pains and penalties of perjury.

Heidi K. Erickson, *pro se*  
July 19<sup>th</sup>, 2004